

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

**EDWARD BUTOWSKY, in his personal and
professional capacities,**

Plaintiff,

v.

MICHAEL GOTTLIEB, *et al.*,

Defendants.

Case No. 4:19-cv-00180-ALM-KPJ

ORAL ARGUMENT REQUESTED

**DECLARATION OF PAUL J. SKIERMONT IN SUPPORT OF MOTION TO DISMISS
AND SUPPORTING MEMORANDUM FOR DEFENDANTS
GOTTLIEB, GOVERNSKI AND BOIES SCHILLER FLEXNER LLP**

I, Paul J. Skiermont, hereby declare as follows:

1. I am an attorney with Skiermont Derby LLP, and counsel of record for Defendants Michael Gottlieb, Meryl Goverski, and Boies Schiller Flexner LLP in the above-captioned action. This Declaration is made in support of those defendants' Motion to Dismiss the Complaint in this action.

2. I am over the age of 21 years and am competent to make this declaration. All of the statements set forth herein are true and correct and are based on my personal knowledge.

3. Attached as Exhibit A to this Declaration is a true and correct copy of the Complaint (Dkt. 3) in the lawsuit styled *Rich v. Butowsky et al*, 1:18-cv-00681-RJL (D.D.C. Mar. 26, 2018).

4. Attached as Exhibit B to this Declaration is a true and correct copy of an Order filed in the lawsuit styled *Butowsky v. Susman Godfrey, LLP*, No. 416-01222-2019, (426th Dist. Ct., Collin Cty., Tex. May 22, 2019).

5. Attached as Exhibit C to this Declaration is a true and correct copy of a television interview transcript, Transcript, *Anderson Cooper 360: Seth Rich's brother sues right-wing activists*, CNN (Mar. 27, 2018), video available at <https://www.cnn.com/videos/us/2018/03/28/michael-gottlieb-seth-rich-brother-attorney-ac.cnn> (last accessed June 19, 2019).

6. Attached as Exhibit D to this Declaration is a true and correct copy of a news article titled *Retraction: Aaron Rich and the murder of Seth Rich*, The Washington Times (Sept. 30, 2018), available at <https://www.washingtontimes.com/news/2018/sep/30/retraction-aaron-rich-and-murder-seth-rich> (last accessed June 19, 2019).

7. Attached as Exhibit E to this Declaration is a true and correct copy of a news article, Jane Coaston, *A right-leaning newspaper is finally retracting the conspiracy theories it published*

about Seth Rich, Vox (Oct. 1, 2018), <https://www.vox.com/policy-and-politics/2018/10/1/17923178/washington-times-seth-rich-aaron-rich-trump-fox-news> (last accessed June 19, 2019).

8. Attached as Exhibit F to this Declaration is a true and correct copy of the ECF docket in the lawsuit captioned *Rich v. Butowsky et al*, 1:18-cv-00681-RJL (D.D.C.) as of May 31, 2019, showing a Minute Order (no docket number) dated March 29, 2019.

9. Attached as Exhibit G to this Declaration is a true and correct copy of the Defendant's Answer as served on the Plaintiff in the lawsuit captioned *Rich v. Butowsky et al*, 1:18-cv-00681-RJL (D.D.C. May 28, 2019).

10. Attached as Exhibit H to this Declaration is a true and correct copy of the publicly-available LinkedIn profile page of Ed Butowsky, available at <https://www.linkedin.com/in/edbutowsky/> (select "More" > "Save to PDF") (last accessed June 19, 2019).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 21st day of June 2019, in Dallas, Texas.

/s/ Paul J. Skiermont
Paul J. Skiermont
Counsel for Michael Gottlieb, Meryl
Goverski, and Boies Schiller Flexner LLP